

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

CASE NO: 7:25-cv-03821 (KMK)

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MATTHEW J. FECTEAU,

Plaintiff,

v.

SAFETY NATIONAL CASUALTY CORPORATION,  
SEDGWICK CLAIMS MANAGEMENT SERVICES, INC,

Defendants,

-----X

NOTICE OF MOTION FOR RELIEF UNDER THE SERVICEMEMBERS CIVIL  
RELIEF ACT

Matthew J. Fecteau  
123 N 7<sup>th</sup> Ave  
Mount Vernon, New York 10550  
347-839-2072  
Matthew.fecteau@gmail.com

June 13<sup>th</sup> 2025

PLEASE TAKE NOTICE that, upon the accompanying Declaration and proceedings, Plaintiff hereby moves this Court, before the Honorable Kenneth M. Karas, United States District Judge, at the United States Courthouse, 300 Quarropas Street, White Plains, New York, on a date and time to be designated by the Court, for an Order pursuant to the Servicemembers Civil Relief Act (“SCRA”), 50 U.S.C. § 3901 et seq., granting the following relief:

1. Tolling of all applicable deadlines pursuant to 50 U.S.C. § 3936, in light of Plaintiff’s ongoing active duty military service;
2. Recognition that the March 20, 2025 ruling in the sister case (*Fecteau v. City of Mount Vernon*, 23-CV-9173) —rendered while Plaintiff was on Title 10 orders—forms the substantive basis for the threatened Rule 11 sanctions in the instant matter, and that tolling affects Plaintiff’s ability to contest the legal pretext of removal, joinder, and related procedural issues;
3. Acknowledgment that the effect of tolling on the propriety of Defendants’ subsequent Notice of Removal (infamously known as the ethically questionable “snap removal” but it is still debatable where Sedgwick’s “nerve center” takes up residency) and litigation posture in legally shallow, warranting caution and equitable relief;
4. Any other and further relief that the Court deems just and proper under the Servicemembers Civil Relief Act.

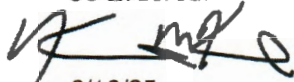
Respectfully submitted,

/s/ Matthew J. Fecteau  
Matthew J. Fecteau  
123 N 7th Ave  
Mount Vernon, NY 10550

347-839-2072  
Matthew.fecteau@gmail.com

Defendants are to respond to this Motion by 6/30/25.

So Ordered.

  
6/16/25